John O. Lukanski, Esq. (JL-2846) Wolff & Samson PC The Offices at Crystal Lake One Boland Drive West Orange, New Jersey 07052 973-325-1500 Attorneys for Plaintiff

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

RICARDO CASTIBLANCO,

Plaintiff,

ECF CASE

EBER BROS.-NDC, LLC; LESTER EBER;

JOHN DOES 1-5, JOHN DOE, LLC's 1-05;

JOHN DOES, INC. 1-5,

vs.

Defendants.

NOTICE OF MOTION FOR ADMISSION PRO HAC VICE OF JOSEPH A. DICKSON, ESQ.

Case No. 08-CV-06029 (LAP)

To: Patrick J. Dalton, Esq.

Harris Beach PLLC 99 Gamsey Road

Pittsford, New York 14534

PLEASE TAKE NOTICE that upon the Declarations of John O. Lukanski, Esq. and Joseph A. Dickson, Esq., filed herewith, plaintiff Ricardo Castiblanco ("Castiblanco"), by and through its undersigned counsel, shall move before this Court for entry of an Order pursuant to Local Rule 1.3 (c) granting the admission *pro hac vice* of Joseph A. Dickson, Esq., a member of the firm of Wolff & Samson PC and a member in good standing of the bar of the State of New Jersey, to act as an attorney for plaintiff in this matter. As set forth in the supporting Declaration of Joseph A. Dickson, Esq., there are no pending disciplinary actions against Mr. Dickson in any State or Federal court.

By:

Dated: August 8,2008 WOLFF & SAMSON PC

One Boland Drive West Orange, New Jersey 07052-3698 (973) 325-1500 jlukanski@wolffsamson.com

/s/ John O. Lukanski

JOHN O. LUKANSKI (JL-2846)

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## **DECLARATION OF SERVICE**

JOHN O. LUKANSKI, an attorney duly admitted to practice before the United States

District Court for the Southern District of New York, declares as follows:

On August 6, 2008, I caused a true copy of the within Notice of Motion for the Admission Pro Hac Vice of Joseph A. Dickson, Esq., together with a copy of the supporting Declarations of John O. Lukanski, Esq. and Joseph A. Dickson, Esq., and a proposed form of Order to be filed to be filed by electronic means with the Clerk of Court, United States District Court of Southern District of New York.

A copy of the foregoing papers was also served by upon counsel for defendants listed below by electronic filing and regular mail:

> Patrick J. Dalton, Esq. Harris Beach PLLC 99 Gamsey Road Pittsford, New York 14534 Attorneys for Defendant

I declare under penalty of perjury that the foregoing statements are true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ John O. Lukanski

Dated: August 8, 2008